

JULIO A. ZUNIGA, et al.,

VS.

PATRICK O' DANIELS, et al.,

APR 26 2022

Nathan Ochsner, Clerk of Court

ORDER TO SHOW CAUSE FOR A PRELIMINARY INJUNCTION
& A TEMPORARY RESTRAINING ORDER - (TRO)

Upon the Complaint, the supporting affidavits of plaintiffs, and the MEMORANDUM OF LAW submitted herewith, IT IS:
ORDERED that the defendants: (PATRICK O' DANIELS / BOBBY LUMPKIN / BRYAN COLLIER / GUISTINA PERSICH / TAMMY SHELBY ET AL., ON 3:22-CV-00052, CONSIDERED AS DEFENDANTS that PLAINTIFFS has REQUESTED TO AMEND: BRIDGETT HAYES / WILLIE RATLIFF / TIMOTHY WILLIAMS / CHARLOTTE MCKNIGHT / PATTY POLK / TIA BEY / TANIKIA HAFORD / ELISHA BAUGH / ALEXANDRIA FORD / MARCUS COOPER / FREDRICK GOODEN / LORPU DORBER, et al., SHOW CAUSE IN ROOM #411 OF THE UNITED STATES COURT HOUSE, 601 ROSENBERG STREET / GALVESTON, TEXAS 77550, ON the 26 day of APRIL, 2022, @ 10 O'clock, WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE PURSUANT TO RULE 65(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE enjoining the defendants, their successors in office, AGENTS AND EMPLOYEES and all other PERSONS ACTING IN CONCERT (DIRECTLY OR INDIRECTLY) and PARTICIPATION WITH them, FROM: BLOCKING PEOPLE FROM REGISTERING ON my TEXAS PRISON PHONE.COM/ACCOUNT to STOP HARRASSING PLAINTIFFS BY FOLLOWING THEM ON CAMERA AND SENDING OFFICERS to INTIMIDATE / PROVOKE / RETALIATE FOR UNITING WITH IWOC OR BEING IWOC MEMBERS.
STOP DENYING US OUR STATE ISSUE TABLETS OUT OF RETALIATION FOR TBCJ / TOCJ.
STOP BLOCKING / HOLDING OUR COMMUNICATION VIA MEDIA MAIL / LEGAL MAIL, ... TBCJ HAS SENT AGENT MITCHELL TO CAUSE RACIAL TENSION IN CHAPEL BY TARGETING THE SPANISH / LATIN-X COMMUNITY. ... IT IS ON RECORD. REQUEST RELEASE OF MY FOUR F-60'S TO RISK MANAGEMENT WHO HAS BEEN IGNORING MY REQUEST TO RETURN THEM TO US, ... REQUEST SR. WARDEN HAYES TO PREPARE TO OPEN RESPITE AREA'S WITHOUT USING IT AS A WEAPON AGAINST SICK / DEBILITATED WORKERS WHO ARE ALL SICK WITH WATER-CONTAMINANTS. ORDER WATER-TOWER INSPECTED BY FEDERAL INSTITUTION FOR VIOLATION OF CLEAN WATER ACT.

IT IS ORDERED that the ORDER to Show Cause, and all other papers attached to this application, be SERVED ON the aforesaid Plaintiffs by:
4/25/22 - MONDAY
HONORABLE JUDGE

Respectfully Submitted,

Julio A. Zuniga
(59 Dineria Road)
Rushmore, TX 77583
TDCJ #1961551) IWOC - TEXAS
X386964

DATE: 4/18/22

ALEXANDER V. RIZZO, 50 F.R.D. 374

VILLANTE V. DEPT OF CORRECTIONS OF CITY OF NEW YORK, 786 F.2d 516, 519 (1986)

Helling v. McKinney, 509 U.S. 25, 35, 113 S. CT. 2475 (1993)

Allegheny County Jail v. Wecht, 874 F.2d 147, 154 (1989)

WHITE V. COOPER, 55 F. Supp. 2d 848, 858 (1999)

PROCUNIER V. MARTINEZ, 416 U.S. 396

NASIR V. MORGAN, 350 F.3d 366, 369 n.3

ROWE V. SHAKE, 196 F.3d 778

CANADIAN COALITION AGAINST THE DEATH PENALTY V. RYAN, 269 F. Supp. 2d 1199

GARDNER V. HOWARD, 109 F.3d 427, 430-31

THE CHICAGO READER V. Sheahan, 141 F. Supp. 2d 1142

OWEN V. LASH, 682 F.2d 648

SPRUYETTE V. HOFFNER, 191 F. Supp. 2d 736

ABU-JAMAL V. PRICE, 154 F.3d 128

FARID V. GOORD, 200 F. Supp. 2d 220

TURNER V. JOHNSON, 46 F. Supp. 655, 660-63

HOSKINS V. LENEAR, 395 F.3d 372, 375

VANCE V. BARRETT, 345 F.3d 1083, 1093-94

DANNENBERG V. VALADEZ, 338 F.3d 1070, 1072

CRUZ V. BETO, 603 F.3d 1178, 1186

JONES V. NORTH CAROLINA PRISONERS LABOR UNION, 433 U.S. 119, 136, 97 S. CT. 2532

GREASON V. KEMP, 891 F.2d 829, 836

WATHEN V. SCHIRRO, 2009 WL 2632719 (Tgba)

RAY V. CARUSO, 2009 WL 2230935

CONN V. City OF RENO, 572 F.3d 1047, 1064

IN RE HARRELL, 2 CAL.3d 675, 87

THERE IS HEAVY SURVEILLANCE and Mailroom Tampering with the outgoing mail, Primarily BECAUSE OF THE MEDIA/STATE REPS/STATE BAR/ LOCAL GOVERNMENT TO WHOM I AM EXPOSING CORRUPTION/CONSPIRACY TO COVER-UP HABEAS CORPUS/CONTRABAND ENTRAPMENT RINGS IN TDC-MAILROOMS. THE STATISTICS (TDC/TDC) OF THE INCOMING CONTRABAND IS WELL DOCUMENTED, WITNESS (LORI DAVIS-TDC DIRECTOR FORMERLY) WARDEN POWERS-(FORMER)

TO DENY MY OUTSIDE SUPPORTERS ACCESS TO ME THRU BLUE PHONE IS ONCE AGAIN DELIBERATE INDIFFERENCE/"MALICE"/"EVIL INTENT"/"CRUEL AND UNUSUAL PUNISHMENT" MY REQUEST IS TO AVOID FURTHER "IRREPARABLE HARM", MY MENTAL HEALTH IS IN TATTERS, TDC WILL NOT STOP BLOCKING MY T-60'S FROM REACHING DEPT OR ALLOWING ME TO RECEIVE THEM. I AM LEAVING PAPER TRAIL WITH OUR DEMANDS AS A UNION, -- AND I AM ONCE AGAIN REPORTING TO U.S. MARSHAL'S THE CONTRABAND ENTRAPMENT RINGS OPERATING IN ALL 6 REGIONS OF TEXAS DEPT. OF CRIMINAL JUSTICE --- AND I AM MOSTLY THE ONLY ONE THAT FOLLOW AROUND, -- EVERYONE ELSE IS BEING WATCHED BY 3RD SHIFT OFFICERS WHO HIDE IN ROOMS TO WATCH ME ON CAMERA. I HAVE BEEN ASKING M.S. HOWARD TO STOP CONSPIRING TO COVER-UP FOR HER SUBORDINATES. BRANDY SHANNON HAS SINCE BEEN FIRED/TRANSFERRED AFTER I REPORTED THEIR SET-UP TO U.S.D.C., -- HER HARM HAS BEEN DONE, SO THE STATE SPIT HER OUT. MARCUS COOPER/FREDERICK GOODEN ARE STILL MANIPULATING DISCIPLINARY HEARINGS AND TELLING CPT'S TO SHAM ALL INOC MEMBERS, LITERALLY WALKING INTO THE HEARING TO YELL OUT HIS/THEIR "EVERYONE IS GUILTY" SPEECH. I NEED COURT PROTECTION TO BE ABLE TO LITIGATE FRANKLY.

I HAVE RECENTLY FORCED TDCJ TO STOP BLOCKING FRANCISCA LOPEZ (505) 494-0896
Case 3:22-cv-00052 Document 28 Filed 04/26/22 in TXSD Page 3 of 4
MY PUNISHMENT IS OVER ON THE 28TH, OF APRIL, -- MAJORS AND
WARDEN'S ARE PREPPING TO SEND LT. OKI / SGT. S. UDOCHUKWU TO
HARRASS ME AND KEEP ME FROM MAKING MY MORNING CALL'S TO COMRADES/
SUPPORT SYSTEM, TRO-W/ BEVERY EFFECTIVE IS PUTTING A STOP TO THIS
KIND OF RETALIATORY ATTACKS. IT'S ALL EYES ON "Z", -- I'VE TOLD
SR. WARDEN B. HAYES, THAT I AM HAVING TO FILE A (TRO), AND SHE
DID NOT CARE, -- NOW, IT'S SO TENSE, THEY RUN AND HIDE IN THE
FRONT OFFICE, THEN LET ME ROAM TO POINTS OF DESTINATION, SO I
DON'T PULL THEM OVER. THEY USE RADIOS, PHONE, CAMERAS,
TO COMMUNICATE MY LOCATION AND AVOID ME AT ANY COST, SO THAT
THEY SEEM INVISIBLE WHEN THEY ATTACK. ONLY THE TACTIC IS SO OLD,
I FLIP IT ON THEM, HOWEVER, I CANNOT SPEAK TO THEM ABOUT
THIS "TRO" BECAUSE FEAR OF BEING SET-UP AGAIN.

I DO PRAY THAT UNDER PENALTY OF PERJURY, THE
ALLOW THIS AS "SAM JONES" DECLARATION, THAT ALL THE INFORMATION
AND ALLEGATIONS ARE TRUE AND CORRECT.

I DO NOT HAVE LEGAL COUNSEL, AND THE COMPLEXITY OF THIS
CASE IS TRULY AFFECTING MY OVERALL "MENTAL HEALTH".

4/18/22

STATE PERS. CONTACTED BY MAIL:

ALMA ALLEN
DENNIS BONNEN
DAN HUBERTY
WILL METCALF
RICK MILLER
RON REYNOLDS
CARLO. SHERMAN
PHIL STEPHENSON

ANGLETON TIMES 2 - MEDIA MAIL

1 - U.S. MARSHALLS @ HOUSTON FIELD OFFICE - LEGAL MAIL

Respectfully Submitted,

Julio A Zuniga #1961551
59 DARRINGTON RD.
ROSTHARON, TX 77583

STATE OF TEXAS

COUNTY OF BRAZORIA

UNSWORN DECLARATION- State Law

The following declaration is made pursuant to federal law, 28 U.S.C.A. § 1746 and State law V.T.C.A. Civil Practice and Remedies Code § 132.001 – 132.003:

"My name is, JULIO A ZUNIGA my date of birth is 12/23/79 and my inmate identifying number, is 1961551. I am presently incarcerated in TDCJ-ID, at the Darrington Unit in Rosharon/ Brazoria County, Texas 77583. I declare under penalty of perjury that foregoing is true and correct.

Executed on this the 18TH, day of April, 2022.

/s/ Julio A. Zuniga IWW-IWOC #X386969